



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

ATTY.'S DOCKET: TAMURA=5

In re Application of:	)	Art Unit: 1623
	)	
TAMURA et al.	)	Examiner: L. C. Maier
	)	
Appln. No.: 09/700,879	)	Washington, D.C.
	)	
Filed: November 20, 2000	)	April 26, 2005
	)	
For: CONJUGATE OF THERAPEUTIC )		
AGENT FOR JOINT DISEASE AND)		Confirmation No.: 4195
HYALURONIC ACID	)	

**RESPONSE**

Honorable Commissioner for Patents  
U.S. Patent and Trademark Office  
Customer Service Window  
Randolph Building, Mail Stop Amendment  
401 Dulany Street  
Alexandria, VA 22314

Sir:

This communication is responsive to the Office Action of January 26, 2005. The Office Action and the cited and applied references have been carefully reviewed. No claim is allowed. Claims 1, 3, 5-12, 17, 18 and 22-25 presently appear in this application and define patentable subject matter warranting their allowance. Reconsideration and allowance are hereby respectfully solicited.

Briefly, the presently claimed compound is a conjugate of (1) at least one therapeutic agent for joint diseases which is bonded via a spacer to (2) hyaluronic acid, a hyaluronic acid derivative or a salt thereof wherein a carboxyl group of said

hyaluronic acid or derivative or salt thereof and an amino group of said spacer form an amide bond. The conjugate of the present invention exerts a superior effect for the treatment of joint diseases and can be retained without being dissociated or decomposed at the target site (i.e., a joint cavity) for a long period of time and thus, hyaluronic acid and a therapeutic for joint disease exhibit their own effects to produce the desired synergism at the target site with less frequency of administration.

Claims 1, 5, 8, 12, 23 and 24 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Akima et al., U.S. Patent 5,733,891. This rejection is respectfully traversed.

The Akima reference relates to a compound of hyaluronic acid and a medicinal ingredient produced by the covalent bonding of hyaluronic acid and the medicinal ingredient. In the compound of Akima, hyaluronic acid merely acts as a carrier and not as an active agent which acts synergistically with the medicinal ingredient.

Akima exemplifies a compound of hyaluronic acid and daunomycin (registered trademark) via  $\epsilon$ -aminocaproic acid as a spacer in Example 2, where the spacer is used in order to overcome the difficulty of dissolving hyaluronic acid in an organic solvent ( $\epsilon$ -aminocaproic acid is introduced to a carboxylic acid of hyaluronic acid, thereby making hyaluronic

acid hydrophobic and easier to combine with medicinal ingredients which are difficult to dissolve in water). It should be noted that daunomycin is an antibiotic exerting an antitumor activity but which has no relationship to joint disorders.

In Akima, it is expected that the disclosed compound is decomposed to release a medicinal ingredient that will exert its pharmaceutical effect. It is however not expected in Akima that the disclosed compound is retained without being dissociated or decomposed at the target site, whereby hyaluronic acid and a medicinal ingredient exhibit their own effects to produce the desired synergism at the target site, as in the present invention.

In particular, Akima discloses that the compound specifically migrates to target sites (the same regional lymph nodes as those of cancer), where, due to the decomposition of the hyaluronic acid by the patient's metabolism, an anticancer agent is quantitatively released, thereby exerting its pharmaceutical effects (see column 4, lines 10 to 24). Akima also discloses that hyaluronic acid is a superior carrier which specifically accumulates in tumor tissues.

For the reasons discussed above, hyaluronic acid is merely used in Akima as a carrier for delivery of a medicinal ingredient to form its prodrug. Therefore, the hyaluronic acid

disclosed in Akima is quite different in technical concept from the presently claimed invention.

In addition, a spacer is merely used in Akima in order to overcome the difficulty in producing a compound combining medicinal ingredients with hyaluronic acid. Akima clearly discloses that a spacer is used to overcome the difficulty of dissolving hyaluronic acid in an organic solvent (see, in particular, column 4, lines 10 to 24). Only Example 2 provides a disclosure relating to a spacer; the other examples disclose that hyaluronic acid directly bonds to a medicinal ingredient.

Akima neither discloses nor teaches about a specific effect of a conjugate via a spacer as in the present invention wherein a therapeutic agent for joint disease and hyaluronic acid both exert their own effects, a surprisingly superior property which would not be expected or made obvious by Akima's disclosures and teachings.

In the disclosure at column 3, line 12 of the Akima reference, prednisolone is merely listed as one example of a hormonal anti-cancer agent. Regarding the concept of Akima's invention, applicants submit that it is entirely different from the present invention in that it resides in the creation of an anti-cancer agent which effectively migrates to tumors. All the specific examples of the medicament agent listed in Akima only relate to anti-cancer agents. The examples of medicaments in

Akima that are listed as hormonal anti-cancer agents provide no motivation for one of skill in the art to use a conjugate of hyaluronic acid and prednisolone in order to treat joint disorders simply because prednisolone happens to be known to have use as an agent for treating joint disorders.

Under such a condition, Akima has no reasonable expectation of success as provided by the present invention, where the conjugate of hyaluronic acid and a therapeutic for joint disease via a spacer can be retained without being dissociated or decomposed at the target site (i.e., a joint cavity) for a long period of time and thus, hyaluronic acid and a therapeutic for joint disease exhibit their own effects to produce the desired synergism at the target site.

In a complex of hyaluronic acid and daunomycin via a spacer in Example 2, daunomycin is an anti-cancer agent and is quite different from and has no relationship to an agent for treating joint diseases. Attached hereto is a copy of a package insert for CERUBIDINE (BEDFORD Laboratories, Inc.) which is commercialized in the US as a similar drug to daunomycin. As can be clearly seen, there is no disease disclosed in Akima that has relevance to joint diseases.

Accordingly, Akima cannot make obvious the presently claimed invention. Reconsideration and withdrawal of this rejection are therefore respectfully requested.

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Claims 1, 3, 5-10, 12, 18, 23, and 24 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Akima and Gallardy, WO 92/09563. This rejection is respectfully traversed.

Gallardy (WO 92/09556) merely contains a general description which states that the compounds "can be conjugated to carriers" (see page 5, line 15). However, Gallardy does not provide specific examples relating to a conjugate. Moreover, the disclosures and teachings of Gallardy do not satisfy the deficiencies in Akima as noted and discussed above in the obviousness rejection over Akima alone. The cited and applied Akima and Gallardy references, either alone or in combination, cannot lead one of ordinary skill in the art to the presently claimed conjugate of a therapeutic agent for joint disease and hyaluronic acid.

Reconsideration and withdrawal of the rejection are therefore respectfully requested.

Claims 1, 3, 5-12, 17, 18, and 22-25 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Prestwich, U.S. Patent 5,874,417, in view of Akima and Gallardy. This rejection is respectfully traversed.

Prestwich teaches that the essential feature of Prestwich's invention resides in crosslinking of hyaluronic acid via hydrazide linkage and takes advantage of the chemical nature

specific to hydrazide (see column 2, line 54 to column 3, line 26). The hydrazine group used to form the conjugate (HA-CO-NH-NH-...) disclosed in Prestwich is quite different from the amino group used to form the conjugate (HA-CO-NH-...) recited in the present invention as argued in the Amendment filed November 1, 2004. Therefore, it is not obvious for one of ordinary skill in the art to replace the hydrazide linkage in the conjugate (HA-CO-NH-NH-...) disclosed in Prestwich with an amido linkage which has quite a different nature than an hydrazide linkage.

Furthermore, hyaluronic acid or a hyaluronic acid derivative in the conjugate disclosed in Prestwich can merely be used as carriers for drug delivery to release a variety of drugs (see column 2, lines 39 to 42; column 3, lines 25 to 28).

Prestwich also does not suggest that a therapeutic agent for joint disease and hyaluronic acid exhibit their own effects for the treatment of joint diseases, much less that they exhibit synergistic effects for the treatment of joint diseases as they are kept joined to each other via the spacer.

Consequently, the cited and applied references, taken either alone or in combination, cannot lead one of ordinary skill in the art to the present conjugate of a therapeutic agent for joint disease and hyaluronic acid, a conjugate which has an unexpectedly superior property in that it exhibits the above-mentioned synergistic effects for the treatment of joint diseases

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at the target site as the therapeutic agent and hyaluronic acid are kept joined to each other via the spacer without being dissociated or decomposed for an extended period of time.

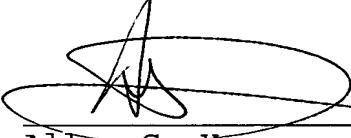
Reconsideration and withdrawal of this rejection are therefore respectfully requested.

In view of the above, the claims comply with 35 U.S.C. §112 and define patentable subject matter warranting their allowance. Favorable consideration and early allowance are earnestly urged.

Respectfully submitted,

BROWDY AND NEIMARK, P.L.L.C.  
Attorneys for Applicant(s)

By



Allen C. Yun

Registration No. 37,971

ACY:pp  
Telephone No.: (202) 628-5197  
Facsimile No.: (202) 737-3528  
G:\BN\Y\YUAS\Tamura 5\PTO\Response OA 1-26-05.doc

## PREDEFINITION

### CERUBIDINE (GEMTAROZOLE HCl) FOR INJECTION

Rx Only.

℞/Rx Only

1. Cerubidine must be given into a rapidly flowing intravenous infusion. It must never drip by the intravenous or subcutaneous route. Severe local tissue necrosis will occur if there is extravasation during administration.
2. Myelosuppression manifested in its most severe form by potentially fatal congestive heart failure may occur after during therapy of months to years after termination of therapy. The incidence of myelosuppression is approximately 40% of the disease within 10 minutes and 10% after a total cumulative dose exceeding 400 to 550 mg/m<sup>2</sup>. In adults, 300 mg/m<sup>2</sup> in children more than 2 years of age, or 10 mg/kg in children less than 2 years of age.
3. Severe myelosuppression occurs when used in therapeutic doses; this may lead to infection or hemorrhage.
4. It is recommended that Cerubidine be administered only by physicians who are experienced in leukemia chemotherapy and in facilities with laboratory and supportive resources adequate to monitor drug tolerance and protect and maintain a patient compromised by drug toxicity. The physician and institution must be capable of responding rapidly and completely to severe hemorrhagic conditions and/or overwhelming infection.
5. Dosage should be reduced in patients with impaired hepatic or renal function.

### CERUBIDINE (GEMTAROZOLE HCl) FOR INJECTION

#### CERUBIDINE (GEMTAROZOLE HCl) FOR INJECTION

**EXCITATIONS AND TOXICITY**

Cerubidine in combination with other approved anticancer drugs is indicated for remission induction in patients with non-Hodgkin's lymphoma, Hodgkin's lymphoma, and acute lymphocytic leukemia in children and adults and for remission induction in adults with lymphocytic leukemia or chronic lymphocytic leukemia.

#### EXCITATIONS AND TOXICITY

Cerubidine is contraindicated in patients who have shown a hypersensitivity to it.

#### EXCITATIONS AND TOXICITY

**CERUBIDINE:** Cerubidine is a potent bone marrow suppressant. Suppression will occur in all patients given a therapeutic dose of this drug. Therapy with Cerubidine should not be started in patients with pre-existing drug-induced bone marrow suppression unless its benefit from such treatment warrants the risk. Persistence, severe myelosuppression may result in superinfection of hematoma.

#### EXCITATIONS AND TOXICITY

**CERUBIDINE:** Cerubidine is a potent bone marrow suppressant, particularly in infants and children. Pre-existing heart toxicity of Cerubidine, particularly in infants and children. Pre-existing heart disease and previous therapy with doxorubicin are risk factors of increased risk of Cerubidine-induced cardiotoxicity and the benefit-to-risk ratio of Cerubidine therapy in such patients should be weighed before starting Cerubidine. In adults, at total cumulative doses less than 250 mg/m<sup>2</sup>, adult competitive heart failure is seldom encountered. However, cases instances of pericarditis-myocarditis, not dose-related, have been reported.

#### EXCITATIONS AND TOXICITY

In adults, at cumulative doses exceeding 550 mg/m<sup>2</sup>, there is an increased incidence of drug-induced competitive heart failure. Based on pilot clinical experience with doxorubicin, this limit appears to have, namely 400 mg/m<sup>2</sup>.

#### EXCITATIONS AND TOXICITY

In infants and children, there appears to be a greater susceptibility to antibiotic-induced cardiotoxicity compared to that in adults, which is tripled by doxorubicin-related. Antibiotic therapy (including doxorubicin) in pediatric patients has been reported to produce transient left ventricular systolic performance, prolonged left ventricular diastole. These conditions may occur months to years following cessation of doxorubicin. This appears to be dose-dependent and aggravated by chemotherapy. Long-term periodic evaluation of cardiac function in such patients should thus be performed. In both children and adults, the total dose of Cerubidine administered should also take into account any previous or concurrent therapy with other potentially cardiotoxic agents or related compounds such as doxorubicin.

#### EXCITATIONS AND TOXICITY

**GEMTAROZOLE Patients:** Although appropriate studies with Cerubidine have not been performed in the pediatric population, cardiototoxicity may be more frequent in the elderly. Caution should also be used in patients who have had equal bone marrow function as old age. In addition, elderly patients are more likely to have age-related renal function impairment, which may require reduction of dose. In patients receiving Cerubidine.

#### EXCITATIONS AND TOXICITY

**DOSE AND HYPOTENSIVE IMPAIRMENT:** Doses of Cerubidine should be reduced in patients with serum bilirubin concentrations greater than 3 mg/dL due to drug-induced renal impairment. Patients with serum creatinine concentrations of greater than 3 mg/dL should receive 50% of the usual daily dose. (See PRECAUTIONS, Reduction of Dose and Dose Limitation).

#### EXCITATIONS AND TOXICITY

**CERUBIDINE:** In the treatment of adult acute nonlymphocytic leukemia, patients with hepatic and renal impairment. Patients with serum bilirubin concentrations of 1.2 to 3 mg/dL should receive 75% of the usual dose and patients with serum bilirubin concentrations greater than 3 mg/dL should receive 50% of the usual daily dose. Patients with serum creatinine concentrations of greater than 3 mg/dL should receive 50% of the usual daily dose. (See PRECAUTIONS, Reduction of Dose and Dose Limitation).

#### EXCITATIONS AND TOXICITY

The addition of Cerubidine to the two-drug induction regimen of vincristine and prednisone increases the rate of complete remission. In children receiving identical doses of vincristine and prednisone with Cerubidine concomitantly, there is no difference in the rate of complete remission between the three drug (Cerubidine-vincristine-prednisone) regimen and the two drugs. There is no evidence of any impact of Cerubidine on the duration of complete remission when a consolidation (vincristine-prednisone) phase is employed as part of a total treatment program.

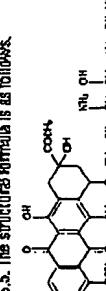
#### EXCITATIONS AND TOXICITY

**CERUBIDINE:** In contrast to childhood acute lymphocytic leukemia receiving identical doses of vincristine and prednisone and maintaining a high rate of complete remission, Cerubidine during induction significantly decreases the rate of complete remission, but not remission duration, compared to that of Cerubidine-vincristine-prednisone. The use of Cerubidine in combination with vincristine, prednisone, and L-asparaginase abrogates the efficacy of the recommended doses of Cerubidine, therefore, prior to administration, evaluation of hepatic function and renal function testing conventional clinical laboratory tests is recommended. (See PRECAUTIONS AND ADVERSE REACTIONS section).

#### EXCITATIONS AND TOXICITY

**PREGNANCY:** Cerubidine may cause fetal harm when administered to a pregnant woman. An increased incidence of fetal abnormalities (cleft palate, cleft lip, cleft palate, omphalocele, hydronephrosis, and hydronephrosis) was reported in infants at doses of 0.15 mg/kg/day or approximately 1/4th of the highest recommended human dose on a 2 body surface area basis. Fetus showed an increased incidence of esophageal catarract and intra-

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**CERUBIDINE PHYSICO-CHEMISTRY**

**Product Description:** Cerubidine has antimitotic and cytotoxic activity through a number of proposed mechanisms of action. Cerubidine forms complexes with DNA by intercalation between base pairs. It inhibits topoisomerase II by stabilizing the DNA-topoisomerase II complex, preventing the religation portion of the deprotein-releasen reaction that requires catalysis. Single stranded and double stranded DNA breaks result. Cerubidine may also inhibit ribonuclease activity, affect regulation of gene expression, and produce free radical damage to DNA.

**Carceridine possesses an antitumor effect against a wide spectrum of animal tumors, either directly or spontaneously.**

**Pharmacodynamics:** Following intravenous injection of Cerubidine, plasma levels of daunorubicin decline rapidly, indicating rapid tissue uptake and concen-

## CARBUDINE (Carbimidine 45%) AND HYDROCHLORIDE

### CARBUDINE (Carbimidine 45%) AND HYDROCHLORIDE FOR INJECTION

#### ADVERSE REACTIONS

Dose-limiting toxicities include myelosuppression and cardiovascular (see 17/28/55 section). Other reactions include:

**Gastroenteritis:** Reversible hepatitis occurs in most patients. Rash, contact dermatitis and urticaria have occurred rarely.

**Gastroenteritis:** Acute nausea and vomiting occur but are usually mild. Anorexia, diarrhea may be of some help. Mucositis may occur in 3 to 7 days after administration. Diarrhea and abdominal pain have occasionally been reported.

**Local:** Extravasation occurs during administration. Severe local tissue reaction, severe cellulitis, thrombophlebitis, or painful induration can result.

**Organic Reactions:** Rash, anaphylactid reaction, fever, and others can occur. Hyperemia may occur, especially in patients with leukemia, and serum uric acid levels should be monitored.

#### PRECAUTIONS

**General:** Therapy with Carbudine requires close patient observation and frequent complete blood-count determinations. Closur, retal, and hepatic function should be evaluated prior to each course of treatment.

Appropriate measures must be taken to control any systemic infection before beginning therapy with Carbudine.

Carbudine may transiently invert a test coloration to the urine after administration, a profound suppression of the bone marrow is usually required. Evaluation of both the peripheral blood and bone marrow is mandatory in the formulation of appropriate treatment plans.

**Uncommon Reactions:** Carbudine may induce hyperuricemia secondary to rapid lysis of leukemic cells. As a preventive, allopurinol administration is usually begun prior to initiating antimetabolic therapy. Blood urea nitrogen and serum creatinine as indicators of liver and kidney function, the following

serum carbudine levels should be inspected visually for particulate matter prior to administration, whenever solution and container permit.

Particulates in order to eradicate the leukemic cells and induce a complete remission, a profound suppression of the bone marrow is usually required.

Evaluation of both the peripheral blood and bone marrow is mandatory in the formulation of appropriate treatment plans.

It is recommended that the dosage of Carbudine be reduced in instances of hepatic or renal impairment. For example, using serum bilirubin and serum creatinine as indicators of liver and kidney function, the following dose modifications are recommended:

Seum Bilirubin	Seum Creatinine	Dose Reduction
1.2 to 1.9 mg% > 1 mg%		25%
	> 3 mg% > 3 mg%	50%

**Contraindications:** Dose-limiting toxicities and contraindications for the approved indication of Remission Induction in Adult Acute Nonlymphocytic Leukemia.

**For Carbudine:** For patients under 20% ED Carbudine 45 mg/m<sup>2</sup>/day IV on days 1, 2, and 3 of the first course and on days 1, 2, or subsequent courses AND carbudine carbudine 100 mg/m<sup>2</sup>/day IV infusion daily for 7 days for the first course and for 5 days for subsequent courses.

For patients 50 years of age and above, Carbudine 20 mg/m<sup>2</sup>/day IV on days 1, 2, and 3 of the first course and on days 1, 2 of subsequent courses AND carbudine carbudine 100 mg/m<sup>2</sup>/day IV infusion daily for 7 days for the first course and for 5 days for subsequent courses. This carbudine dose-reduction is based on a single study and may not be appropriate if optimal supportive care is available.

The attainment of a normalappearing bone marrow may require up to three courses of induction therapy. Evaluation of the bone marrow following recovery from the previous course of induction therapy determines whether a further course of induction treatment is required.

**Precautions:** For Carbudine - Precautions - Carbudine - Precautions - Carbudine - It is not known whether this drug is excreted in human milk and because of the potential for serious adverse reactions in infants from Carbudine, mothers should be advised to discontinue nursing during Carbudine therapy.

**Effects:** See Clinical Pharmacology, Special Population, Effects of Carbudine on Lactation.

**Oral Formulations:** See Clinical Pharmacology, Clinical Pharmacokinetics, Special Population, Carbudine 25 mg/m<sup>2</sup>/day on day 1 every week, carbudine 1.5 mg/m<sup>2</sup>/day on day 1 every week, prednisone 50 mg/m<sup>2</sup>/day daily.

**Drug Interactions:** Use of Carbudine in a patient who has previously received carbudine assesses the risk of carbudine. Carbudine should not be used in patients who have previously received the recommended maximum cumulative doses of carbudine or Carbudine. Octreotide should be used concurrently with Carbudine may also result in increased carbudine toxicity.

Dosage reduction of Carbudine may be required when used concomitantly with other myelosuppressive agents. Hepatotoxic medications, such as high-dose methotrexate, may impair their function and increase the risk of toxicity.



### CARBUDINE (Carbimidine 45%) FOR INJECTION

Refractory or resistant Dose-Schedule and Combinations for the Approved Indications of Carbudine. Indication in Adult Acute Myelogenous Leukemia:

**Intravenous:** Carbudine 45 mg/m<sup>2</sup>/day IV on days 1, 2, and 3 AND oral carbudine 2 mg IV on days 1, 6, and 15; prednisone 40 mg/m<sup>2</sup>/day PO on days 1 through 12, then tapered between days 22 to 25; L-asparaginase 500 U/day x 10 days IV on days 22 through 32.

The contents of vial should be reconstituted with 4 ml of Sterile Water for injection and agitated gently until the material has completely dissolved. The sterile vials contains provide 20 mg of carbudine, with 5 mg of disodium EDTA per ml. The desired dose is withdrawn into a syringe and then injected 10 ml to 15 ml. of 0.9% Sodium Chloride Injection USP and then injected into the tubing of sedation in a rapidly flowing IV infusion of 5% Dextrose Injection, USP or 9% Sodium Chloride Injection, USP.

**Storage and Handling:** Store unconstituted vials at controlled room temperature, 15° to 30° C (59° to 86° F). The reconstituted solution is stable for 24 hours under refrigeration. Protect from light. Protect from light. Ratify in carton until time of use.

If Carbudine contacts the skin or mucous, the area should be washed thoroughly with soap and water. Procedures for proper handling and disposal of cytotoxic drugs should be considered. Several guidelines on this subject have been published.<sup>1-7</sup> There is no general agreement that all of the procedures recommended in the guidelines are necessary or appropriate. It should be practiced to minimize risks to health care professionals.

Ratify in carton until time of use. If Carbudine contacts the skin or mucous, the area should be washed thoroughly with soap and water. Procedures for proper handling and disposal of cytotoxic drugs should be considered. Several guidelines on this subject have been published.<sup>1-7</sup> There is no general agreement that all of the procedures recommended in the guidelines are necessary or appropriate. It should be practiced to minimize risks to health care professionals.

#### ECG SUPPLIED

Carbudine (carbimidine 25%) for injection, is available in bulk rubber-stopper vials, each containing 21.4 mg aluminum, 51.5 mg hydrochloride and ultrafine carbudine 25 mg/mg. In addition, 100 mg of carbudine as a sterile, sterilized lyophilized powder. When reconstituted with 4 ml. of Sterile Water for injection, USP, each ml. contains 5 mg carbudine as a dry active.

Each ECG contains 251.10 mg simple dose vials, carton of 10.

#### REFERENCES

1. Recommendations for the Safe Handling of Parenteral Antineoplastic Drugs. NIH Publication No. 83-2521. For sale by the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402.
2. AHA Council Guidelines for Handling Parenteral Antineoplastic Drugs. JAMA March 15, 1985.
3. National Study Commission on Cytotoxic Exposure. Recommendations for Handling Cytotoxic Agents. Available from Louis R. Jeffrey, S.C.D., Chairman, National Study Commission on Cytotoxic Exposure, Massachusetts College of Pharmacy and Allied Health Sciences, 175 Longwood Avenue, Boston, Massachusetts 02115.
4. Clinical Oncological Society of Australia Guidelines and recommendations for safe handling of antineoplastic agents. Med J Australia 1:425-428, 1983.
5. Jones AB, et al: Safe handling of chemotherapeutic agents: A report from the Mount Sinai Medical Center, Ca: A Cancer Journal for Clinicians Sept/Oct 25-26, 1983.
6. American Society of Hospital Pharmacists. Uniform guidelines for handling cytotoxic and hazardous drugs. Am J Hosp Pharm 41:1033-1049, 1984.
7. Controlling Occupational Exposure to Hazardous Drugs. (OSHA Work-Practice Guidelines), Am J Health Syst Pharm, 15: 665-668, 1988.

**Manufactured by:**  
Ben Venue Laboratories, Inc.  
Bedford, OH 44148

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Bedford, OH 44146

December 1999

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